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19		
		DISTRICT COURT
20	NORTHERN DISTRICT OF CALIFORNIA	
21	CHASOM BROWN, WILLIAM BYATT,	CASE NO.: 4:20-cv-03664-YGR-SVK
22	JEREMY DAVIS, CHRISTOPHER	
22	CASTILLO, and MONIQUE TRUJILLO individually and on behalf of all others	DECLARATION OF M. LOGAN WRIGHT IN SUPPORT OF
23	similarly situated,	PLAINTIFFS' OPPOSITION TO
24	ommuny oreacea,	GOOGLE'S MOTION TO BIFURCATE
4	Plaintiffs,	PUNITIVE DAMAGES AMOUNT
25	V.	Judge: Hon. Susan van Keulen
26	GOOGLE LLC,	
27	Defendant.	
27		

1	I, M. Logan Wright, declare as follows.	
2	1. I am an associate with the law firm Boies Schiller Flexner LLP, counsel for	
3	Plaintiffs in this matter. I am an attorney duly licensed to practice before al courts of the State of	
4	California and appearing for this case. Dkt. 935. I have personal knowledge of the matters set	
5	forth herein and am competent to testify.	
6	2. I submit this declaration in support of "Plaintiffs' Opposition to Google's Motion	
7	to Bifurcate Punitive Damages Amount."	
8	3. Attached hereto as Exhibit 1 is a copy of a document that Google produced in	
9	discovery, bearing Bates Label GOOG-BRWN-00475063.	
10	4. Attached hereto as Exhibit 2 is a copy of a document that Google produced in	
11	discovery, bearing Bates Label GOOG-BRWN-00806426.	
12	5. Attached hereto as Exhibit 3 is a copy of a document that Google produced in	
13	discovery, bearing Bates Label GOOG-BRWN-00169228	
14	6. Attached hereto as Exhibit 4 is a chart cross referencing some of the exhibits listed	
15	on pages 18 and 19 of the parties' combined exhibit list (which Google purportedly seeks to	
16	defer) to portions of Lasinski's report where those documents are cited.	
17	I declare under penalty of perjury under the laws of the United States of America that the	
18	foregoing is true and correct. Executed this 28th day of November, 2023, at Los Angeles,	
19	California.	
20	/s/ M. Logan Wright	
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28	1 [Proposed] Order Denying Google's Motion to Bifurcate Punitive Damages Amount 4:20-cv-03664-YGR-SVK	